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October 25, 2019

The Honorable Andrew B. Altenburg
United States Bankruptcy Court
400 Cooper Street, 4th Floor
Courtroom 4B
Camden, NJ 08012

**RE: Michael Hopkins
Bankruptcy Case No: 18-28111**

Dear Judge Altenburg:

At the conclusion of the plenary hearing held on October 9, 2019 in the above referenced case, Your Honor requested that debtor's counsel submit recommended remedies to the court on or before October 25, 2019.

In response to Your Honor's instructions, debtors provided the proposed remedies which maybe appropriate to redress the errors or omissions committed in conclusion with the sale of 1371 Oriental Avenue, Gloucester City, NJ .

A modified plan is being filed simultaneously with this letter. The debtor has incorporated all the proposed remedies he agrees with. To aid the court, this letter will track the numbers use in the Trustee's letter of October 18, 2019 as follows:

1. Incorporated 821 Hudson Street, Gloucester City, into the plan.
2. Incorporated the administrative fees into the plan.

3. Nissan is being served with the new plan.
4. Wells Fargo arrears of \$3,631.51 is incorporated into the plan.
5. Gloucester City Water and Sewer has been removed and their claim is being objected to. See attached proof of payment
6. \$400.00 has been sent and the debtor is attempting to pay the further arrears of \$1,600.00 as soon as possible.

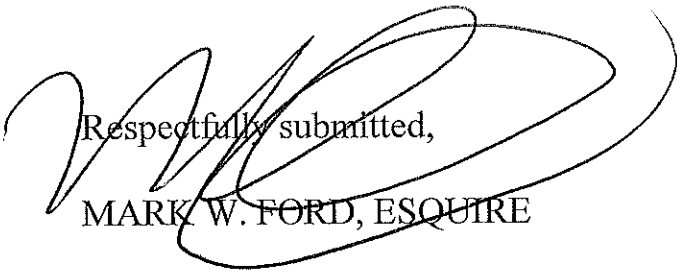
Proposed remedies

1. Mark Ford attorneys fees. Counsel acknowledges that his representation has at times been inadequate. However, in this case even the standard fees requested will not adequate compensation for the extensive amount of work done and this will be required to be done in this case. This case requires far more work than the standard case. There is also likely to be filed soon another motion to approve sale of another property.
2. The debtor. The debtor has a legal or equitable interest in a number of properties and an unresolved estate in which the debtor is the beneficiary of much of his late mother's estate. This was at the present motion to approve sale in which the debtor managed to change the price and go to closing without counsel. There is also another possible sale that may soon go under contract and need to be approved. The debtor is self-employed in which the trustee, quite justifiably requires voluminous paperwork which takes more work.
3. Modification of the plan. Since the trustee has already listed, I will merely list the items the debtor does not agree to.

-objection to payment to Gloucester City of \$1,687.15 secured claim. The stay was lifted and the lien has been paid. See attached payment.

-debtor agrees to payment of 100% to unsecured claims. However, debtor objects to the unsecured claims being paid interest.

-debtor objects to the two year ban on re-filing.



Respectfully submitted,

MARK W. FORD, ESQUIRE

MWF:rp